

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRAFTS, LLC f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC, et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

Case No. 24-cv-00040-EAW-MJR

**NOTICE OF RECEIVER'S EMERGENCY MOTION FOR AN ORDER TO SHOW  
CAUSE WHY RECEIVERSHIP DEFENDANT LIT DEF STRATEGIES, LLC  
AND INDIVIDUAL DEFENDANT JASON BLUST  
SHOULD NOT BE HELD IN CIVIL CONTEMPT**

Moving Party:	Receiver, Thomas W. McNamara
Nature of Action:	Consumer Fraud
Directed To:	Receivership Defendants and Plaintiffs
Date and Time:	As soon as practicable.
Place:	Robert H. Jackson United States Courthouse 2 Niagara Square, Buffalo, New York 14202
Supporting Papers:	Memorandum of Law; Declaration of Alexander D. Wall with attached exhibits.
Answering Papers:	To be filed on schedule as determined by the Court. The Receiver intends to file a reply.
Relief Requested:	An Order Holding Lit Def Strategies, LLC and Jason Blust in Civil Contempt, ordering their immediate compliance with the TRO, imposing a joint \$1,000 fine per day until the contempt is purged, holding Lit Def Strategies, LLC and Jason

Blust liable to the Receivership Estate for actual damages including, but not limited to, the Receiver's attorneys' fees and expenses in bringing the emergency motion.

Grounds for Relief:

This Court's TRO, including Sections XIII.B.

Oral Argument:

Because civil contempt requires that the alleged contemnor receive an opportunity to respond and to be heard at an in-person hearing prior to any finding of contempt, a briefing and hearing schedule should be set to allow Lit Def Strategies, LLC and Jason Blust a full and fair opportunity to be heard.

Dated: February 26, 2024

**HODGSON RUSS LLP**

/s/ James C. Thoman

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By: /s/ Alexander D. Wall

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Thomas W. McNamara*